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19 Attorneys for Plaintiffs
CORY SPENCER, DIANA MILENA
REED, and COASTAL PROTECTION
RANGERS, INC.
20

21 UNITED STATES DISTRICT COURT
22
23 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

24 CORY SPENCER, an individual;
25 DIANA MILENA REED, an
individual; and COASTAL
26 PROTECTION RANGERS, INC., a

CASE NO. 2:16-cv-02129-SJO (RAOx)
**DECLARATION OF GEOFF HAGINS
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANTS
CITY OF PALOS VERDES ESTATES
AND CHIEF OF POLICE JEFF**

1 California non-profit public benefit
2 corporation,

3 Plaintiffs,

4 v.

5 LUNADA BAY BOYS; THE
6 INDIVIDUAL MEMBERS OF THE
7 LUNADA BAY BOYS, including but
8 not limited to SANG LEE, BRANT
9 BLAKEMAN, ALAN JOHNSTON
10 AKA JALIAN JOHNSTON,
11 MICHAEL RAE PAPAYANS,
12 ANGELO FERRARA, FRANK
13 FERRARA, CHARLIE FERRARA,
14 and N. F.; CITY OF PALOS
15 VERDES ESTATES; CHIEF OF
16 POLICE JEFF KEPLEY, in his
17 representative capacity; and DOES
18 1-10,

19 Defendants.

20 **KEPLEY'S MOTION FOR SUMMARY
JUDGMENT OR, IN THE
ALTERNATIVE, SUMMARY
ADJUDICATION**

21 Judge: Hon. S. James Otero

22 Date: August 21, 2017

23 Time: 10:00 a.m.

24 Crtrm.: 10C

25 Complaint Filed: March 29, 2016
26 Trial Date: November 7, 2017

27 I, John Geoffrey Hagins, declare as follows:

28 1. I am a 61-year-old, recently retired correctional officer, living in
Missouri. I grew up in the Hollywood Riviera neighborhood of Torrance,
California. I am a longtime surfer, and surfed regularly in the South Bay until
I moved away in 1997. I have personal knowledge of the facts set forth
herein, except as to those stated on information and belief and, as to those, I
am informed and believe them to be true. If called as a witness, I could and
would competently testify to the matters stated herein.

29 2. On December 29, 2016, I signed a declaration supporting
Plaintiffs' Motion for Class Certification in the matter.

1 3. This new declaration is to authenticate video footage of an
 2 incident where my nephew and I were assaulted by a Bay Boy back in 1995.
 3 While it has been just more than 22 years, I remember this day well. And,
 4 unfortunately, little has changed in the way the Bay Boys operate. And little
 5 has changed in how the City of Palos Verdes Estates treats outsiders –
 6 meaning outsiders are not welcomed in the City, being deterred by both the
 7 Bay Boys and the City itself.

8 4. On March 13, 1995, a news crew accompanied myself and six
 9 other individuals to Lunada Bay and filmed the events that transpired. When
 10 we arrived, one of the people that I was with, Mike Bernard, recognized a
 11 Bay Boy who was on the bluff named Kelly Logan, who said we got a “pass”
 12 that day because they knew each other.

13 5. As we were coming back up the trail, Bay Boy Peter McCollum
 14 approached me, screaming, “Don’t surf on the hill.” He was pounding his
 15 fists very close to my face as he told me, “This is what will happen to you if I
 16 see you again.” He continued to yell numerous things, including, “Come
 17 back and you will be killed.” He then assaulted me, all of which was caught
 18 on camera. He also threatened my nephew Hagan Kelly.

19 6. I have watched the documentary The Swell Life, and it appears
 20 that the director obtained some of the footage from March 13, 1995. When I
 21 compare it to the footage from Channel 13 it appears identical; also the
 22 Channel 13 logo appears in sections of the video. This documentary
 23 accurately depicts Peter McCollum threatening my nephew and Mike
 24 Bernard, where McCollum screams: “He won’t surf here again, though, got
 25 it? Got it? You got that, son? You got it? Hey, hey, I’m touching nobody.
 26 Nothing. But you won’t surf here again, boy. You won’t surf here again.

27

1 Fuck that, fuck you guys! I've been here too long to take this shit." (5:14
2 seconds to 5:31).

3 7. Later in the documentary the Swell Life, there is more film
4 footage from the same day, where McCollum screams: "How many guys are
5 at Malibu right now, huh? How many fucking guys are at Malibu, huh? (I
6 don't know.) Did you ever notice we've done a good thing here, haven't we?
7 It's pretty nice and pretty, huh? (It's beautiful.) It's beautiful! And so when
8 you exploit it, we'll thank you." (15:05 to 15:19). This, too, is an accurate
9 depiction of Peter McCollum on the day he threatened my nephew and me.

10 8. We did nothing to provoke Peter McCollum or any other resident,
11 other than we were not from Palos Verdes Estates, and we showed up at a
12 public beach from out of town.

13 I declare under penalty of perjury under the laws of the United States
14 of America that the foregoing is true and correct.

15 Executed on this 30th day of July, 2017, at INDEPENDENCE
16 Missouri.

John Geoffrey Hagens
JOHN GEOFFREY HAGINS